

Permit



Environment Safety & Health
PO Box 1663, MS K491
Los Alamos, New Mexico 87545
(505) 667-4218/Fax (505) 665-3811

National Nuclear Security Administration
Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87544
(505) 667-5105/Fax (505) 667-5948

Date: JUL 22 2016
Symbol: ADESH-16-102
LA-UR: 16-25218
Locates Action No.: N/A

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Dear Mr. Kieling:

Subject: Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2016

This Semiannual Report is submitted as required by Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Many of the Ordered Actions in SFO Attachment A make reference to specific procedures. Wherever procedures are referenced in Attachment A under the column "Documentation to Provide as Evidence of Completion," the following requirement is found:

Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions.

It was agreed that the Respondents would provide the required document list on January 22 and July 22 of each year. Enclosure 1 lists all procedures revised since they were initially submitted to NMED as part of the Ordered Action responses, along with the effective dates of any revisions. As stated in Attachment A, electronic access to any and all current document revisions will be provided upon NMED request.



The Respondents would be pleased to meet with NMED-HWB personnel to discuss and explain the documentation included herein. If you have comments or questions regarding this submittal, please contact Mark P. Haagenstad (LANS) at (505) 665-2014 or David Nickless (EM-LA) at (505) 665-6448.

Sincerely,



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety & Health
Los Alamos National Security, LLC
Los Alamos National Laboratory

Sincerely,



Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

MTB:KDL:MPH:PBS/ms

Enclosure: (1) Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2016

Cy: Ryan Flynn, NMED, Santa Fe, NM, (E-File)
Kathryn M. Roberts, NMED, Santa Fe, NM, (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)
Jody M. Pugh, NA-LA (E-File)
Karen Armigo, NA-LA, (E-File)
Douglas E. Hintze, EM-LA, (E-File)
Peter Maggiore, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
Ben Underwood, EM-LA, (E-File)
David Nickless, EM-LA, (E-File)
Jordan Arnsward, NA-LA, (E-File)
Kirsten M. Laskey, EM-LA, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, PADOPS, (E-File)
Randall M. Erickson, ADEM, (E-File)
David Funk, ADEM, (E-File)
Enrique Torres, ADEM, (E-File)
Cheryl D. Cabbil, ADNHHO, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna R. Sharp-Geiger, ADESH, (E-File)
John P. McCann, EPC-DO, (E-File)
Andrew Montoya, WM-DO, (E-File)
Jackie Hurtle, WM-DO, (E-File)
Mark P. Haagenstad, EPC-CP, (E-File)
Deborah Woitte, LC-ESH, (E-File)
Susan McMichael, LC-ESH, (E-File)

Cy (continued):

Deborah L. Guffee, SI-DC, (E-File)
Yvette S. Branch, SI-DC, (E-File)
Luciana Vigil-Holterman, EPC-CP, (E-File)
Shanon D. Goldberg, EPC-CP, (E-File)
Paul B. Schumann, EPC-CP, (E-File)
Ellen Gammon, OIO-DO, (E-File)
Tina M. Sandoval, DSESH, (E-File)
Saundra Martinez, OIO-DO, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
emla.docs@em.doe.gov, (E-File)
locatsteam@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)
epccat@lanl.gov, (E-File)

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC
Los Alamos National Laboratory
Operator

7/20/16
Date Signed



Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy
Owner/Operator

7/21/16
Date Signed

ENCLOSURE 1

**Attachment A to Settlement Agreement and Stipulated Final
Order HWB-14-20, Semi-Annual Report for Period
Ending July 22, 2016**

ADESH-16-102

LA-UR-16-25218

Date: JUL 22 2016

Enclosure 1

Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20, Semi-Annual Report for Period Ending July 22, 2016

List of Documents in SFO Attachment A Subject to the Semi-annual Reporting Requirement

Action required (per SFO Attachment A):

“Provide periodic [Semi-annually, or upon NMED request] listing of document(s) revisions.

When due:

January 22 and July 22 of each year until requirement expires.

List of Documents Affected:

Document Title	Current Revision and Effective Date (as submitted with Ordered Action responses)	New Revision and Effective Date*
Ordered Action 1.12		
ENV-CP-QP-115, <i>Compliance Technical Assistance Program (CTAP) Procedure</i>	R0, 09/28/2015	None
ADESH-AP-TOOL-803, <i>Facility TSF Operating Record</i>	R0, 12/15/2015	None
EWMO-AP-20284, <i>EWMO RCRA Permit Operating Record and Compliance Programs</i>	R0, 03/08/2016	None
Ordered Action 1.13		
ADESH-AP-TOOL-117, <i>Using WCATS to Submit Change Requests</i>	R0, 02/08/2016	None
Ordered Action 1.14		
ENV-CP-AP-200, <i>Regulatory Procedure Review of Waste Management Procedures</i>	R1, 09/15/2015	None
Ordered Action 5		
MAN-5004, <i>WCATS User's Manual</i>	R3, 07/16/2015	None
WM-SVS-AP-201, <i>Reviewing and Approving Waste Stream Profiles (WSPs) in WCATS</i>	R0, 04/30/2015	None

* “None” indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.

Document Title	Current Revision and Effective date (as submitted with 3/22/16 Ordered Action responses)	New Revision and Effective date*
Ordered Action 9		
P409, <i>LANL Waste Management</i>	R5, 07/30/2015	None
P315, <i>Conduct of Operations Manual</i>	R6, 07/08/2015	None
P300, <i>Integrated Work Management</i>	R7, 12/09/2015	R8, 06/16/2016
EP-AP-10007, <i>ADEP Technical Procedure Development</i>	R0, 08/13/2015	None
ENV-CP-AP-200, R1, <i>Regulatory Procedure Review of Waste Management Procedures</i>	R1, 09/15/2015	None
EP-AP-10001, <i>ADEP Document Control</i>	R0, 08/13/2015	None
WM-AP-0005, <i>Waste Characterization and Processing Review</i>	R1, 02/18/2015	None
ADESH-IG-TOOL-101, <i>Waste Management Glossary</i>	R0, 12/10/2015	None
ADESH-AP-TOOL-111, <i>Waste Characterization</i>	R0, 12/15/2015	None
ADESH-AP-TOOL-115, <i>Waste Compatibility Determination</i>	R0, 01/14/2016	None
ADESH-AP-TOOL-206, <i>Management of Hazardous Waste by Generators</i>	R0, 12/15/2015	None
ADESH-AP-TOOL-300, <i>Radioactive Waste Management</i>	R0, 02/08/2016	None
ADESH-AP-TOOL-314, <i>Radioactive Characterization of Waste</i>	R0, 02/10/2016	None
ADESH-AP-TOOL-803, <i>Facility TSF Operating Record</i>	R0, 12/15/2015	None
ADESH-AP-TOOL-810, <i>Waste Processing at LANL Hazardous Waste Permitted Units</i>	R0, 01/14/2016	None
ADESH-AP-TOOL-901, <i>Elementary Neutralization</i>	R0, 01/14/2016	None
ADESH-AP-TOOL-902, <i>Sorption without a Permit</i>	R0, 12/23/2015	None
ADESH-AP-TOOL-906, <i>Treatment by the Waste Generator</i>	R0, 02/24/2016	None

* "None" indicates that this document has not been revised since the current revision was submitted to NMED as part of the Ordered Action response on March 22, 2016.